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*Attorneys for Defendants Thomson
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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

No. 07-cv-5944-SC
MDL No. 1917

This Document Relates to:

*Electrograph Systems, Inc. et al. v.
Technicolor SA, et al., No. 13-cv-05724;*

*Alfred H. Siegel, as Trustee of the Circuit
City Stores, Inc. Liquidating Trust v.
Technicolor SA, et al., No. 13-cv-05261;*

*Best Buy Co., Inc., et al. v. Technicolor SA,
et al., No. 13-cv-05264;*

*Interbond Corporation of America v.
Technicolor SA, et al., No. 13-cv-05727;*

*Office Depot, Inc. v. Technicolor SA, et al.,
No. 13-cv-05726;*

*Costco Wholesale Corporation v.
Technicolor SA, et al., No. 13-cv-05723;*

**DECLARATION OF STEPHEN M.
JUDGE IN SUPPORT OF THE
THOMSON DEFENDANTS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL AND OPPOSITION TO
DIRECT ACTION PLAINTIFFS'
MOTION TO ISSUE A LETTER OF
REQUEST FOR INTERNATIONAL
JUDICIAL ASSISTANCE TO TAKE
DEPOSITIONS IN FRANCE**

Judge: Hon. Samuel Conti

DECLARATION OF STEPHEN M. JUDGE IN
SUPPORT OF THOMSON DEFENDANTS'
OPPOSITION AND MOTION TO SEAL

No. 07-5944-SC; MDL No. 1917

1 *P.C. Richard & Son Long Island*
2 *Corporation, et al. v. Technicolor SA, et al.,*
3 *No. 31:cv-05725;*

4 *Schultze Agency Services, LLC, o/b/o*
5 *Tweeter Opco, LLC, et al. v. Technicolor SA,*
6 *Ltd., et al., No. 13-cv-05668;*

7 *Sears, Roebuck and Co. and Kmart Corp. v.*
8 *Technicolor SA, No. 3:13-cv-05262;*

9 *Target Corp. v. Technicolor SA, et al., No.*
10 *13-cv-05686*

11 *Tech Data Corp., et al. v. Hitachi, Ltd., et*
12 *al., No. 13-cv-00157*

13 *Dell Inc. v. Hitachi Ltd.,*
14 *No. 13-cv-02171;*

15 *Sharp Electronics Corp., et al. v. Hitachi,*
16 *Ltd., et. al., No. 13-cv-01173*

17 *ViewSonic Corporation v. Chunghwa Corp.,*
18 *et al., No. 14-cv-02510*

19 I, Stephen M. Judge, hereby declare as follows:

20 1. I am currently an attorney with the law firm Faegre Baker Daniels LLP, counsel
21 for Defendants, Technicolor SA (f/k/a Thomson SA) and Technicolor USA, Inc. (f/k/a Thomson
22 Consumer Electronics, Inc.) (together “Thomson Defendants”). I am admitted to practice *pro hac*
23 *vice* before the United States District Court for the Northern District of California. I make this
24 declaration in support of the Thomson Defendants’ Administrative Motion to Filed Under Seal
25 and Opposition to Direct Action Plaintiffs’ Motion to Issue a Letter of Request for International
26 Judicial Assistance to Take Depositions in France (“Opposition”). The statements contained in
27 this declaration are based on my personal knowledge and, if called as a witness, I could
28 competently testify to the following facts.

29 2. Attached hereto as Exhibit A, and filed under seal, is a true and correct copy of
30 Samsung SDI Defendants’ Supplemental Responses to Direct Purchaser Plaintiffs’ First Set of
31 DECLARATION OF STEPHEN M. JUDGE IN
32 SUPPORT OF THOMSON DEFENDANTS’
33 OPPOSITION AND MOTION TO SEAL
34 No. 07-5944-SC; MDL No. 1917

1 Interrogatories, Nos. 4 and 5, dated October 17, 2011, which the Samsung SDI Defendants have
 2 designated as “Confidential” under the terms of the Stipulated Protective Order entered in this
 3 case (No. 07-cv-05944, Dkt. No. 306, amended at Dkt. No. 1142).

4 3. Attached hereto as Exhibit B is a true and correct copy of the April 11, 2014 letter
 5 from counsel for Plaintiff Sharp Electronics Corporation and Sharp Electronics Manufacturing
 6 Company of America, Inc.’s (together “Sharp”) to Kathy Osborn.

7 4. Attached hereto as Exhibit C is a true and correct copy of Thomson SA’s
 8 Responses to Direct Action Plaintiffs’ First Set of Requests for Production of Documents, dated
 9 May 14, 2014.

10 5. Attached hereto as Exhibit D is a true and correct copy of the June 11, 2014 letter
 11 from counsel for Sharp to Kathy Osborn, summarizing the June 4, 2014 meet and confer.

12 6. Attached hereto as Exhibit E is a true and correct copy of Direct Action Plaintiffs’
 13 and Direct Purchaser Plaintiffs’ Deposition Notice of Didier Trutt Pursuant to Fed. R. Civ. P. 30,
 14 dated August 8, 2014.

15 7. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this
 16 matter (Dkt. No. 306) (the “Protective Order”).

17 8. Pursuant to the Protective Order and Civil Local Rules 79-5(d) and 7-11, the
 18 Thomson Defendants seek to seal the following concurrently filed materials: (a) the highlighted
 19 portions of the Thomson Defendants’ Opposition; and (b) Exhibit A to the concurrently filed
 20 Declaration of Stephen M. Judge in Support of the Thomson Defendants’ Opposition.

21 9. The highlighted portions of the Thomson Defendants’ Opposition discuss or
 22 reference: (a) Exhibit A to the Declaration in Support of the Thomson Defendants’ Opposition; or
 23 (b) allegations contained in paragraph 196 of Sharp Electronics Corporation and Sharp
 24 Electronics Manufacturing Company of America, Inc.’s (together “Sharp”) First Amended
 25 Complaint that have been sealed because they allegedly have been derived from documents
 26 previously designated as “Confidential” or “Highly Confidential” by other parties in this action,
 27 *see* Order Regarding Administrative Motion to Seal Portions of Plaintiffs’ First Amended
 28 Complaint [Dkt. No. 2211].

10. The Thomson Defendants seek to submit these documents under seal in good faith in order to comply with the Stipulated Protective Order and this Court's Local Rules.

I declare under penalty of perjury, under the laws of the United States of America, that the foregoing is true and correct. Executed this 2nd day of September 2014, at South Bend, Indiana.

/s/ Stephen M. Judge